

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

<b>NETSOC, LLC,</b>	)	
<b>Plaintiff,</b>	)	
	)	<b>Civil Action No. 1:18-cv-10262</b>
<b>v.</b>	)	
	)	
<b>CHEGG INC.</b>	)	<b>JURY TRIAL DEMANDED</b>
<b>Defendant.</b>	)	

**PLAINTIFF’S ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT**

NetSoc, LLC (“NetSoc”) files this Original Complaint and demand for jury trial seeking relief from patent infringement of the claims of U.S. Patent No. 9,978,107 by Chegg Inc., alleging as follows:

**I. THE PARTIES**

1. Plaintiff NetSoc is a Texas Limited Liability Company with its principal place of business located in Harris County, Texas.

2. On information and belief, Chegg Inc. (“Chegg”) is a domestic corporation organized and existing under the laws of Delaware, with a principal place of business located in New York, New York. Chegg may be served through its registered agent at Corporation Service Company, 80 State Street, Albany, New York 12207-2541. On information and belief, Chegg sells and offers to sell products and services throughout New York, including in this judicial district, and introduces products and services that perform infringing methods or processes into the stream of commerce knowing that they would be sold in New York and this judicial district.

## II. JURISDICTION AND VENUE

3. This Court has original subject-matter jurisdiction over the entire action pursuant to 28 U.S.C. §§ 1331 and 1338(a) because Plaintiff's claim arises under an Act of Congress relating to patents, namely, 35 U.S.C. § 271.

4. This Court also has original subject-matter jurisdiction over the entire action pursuant to 28 U.S.C. § 1332(a)(1) because Plaintiff is a limited liability company organized under the laws of the State of Texas and Defendant is a Delaware Corporation with a physical place of business located in New York, New York. The matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs.

5. This Court has personal jurisdiction over Defendant because: (i) Defendant is present within or has minimum contacts within the State of New York and this judicial district; (ii) Defendant has purposefully availed itself of the privileges of conducting business in the State of New York and in this judicial district; and (iii) Plaintiff's cause of action arises directly from Defendant's business contacts and other activities in the State of New York and in this judicial district.

6. Venue is proper in this district under 28 U.S.C. §§ 1391(b) and 1400(b). Defendant has committed acts of infringement and has a regular and established place of business in this District.<sup>1</sup> Further, venue is proper because Defendant conducts substantial business in this forum, directly or through intermediaries, including: (i) at least a portion of the infringements alleged herein; and (ii) regularly doing or soliciting business, engaging in other persistent courses of conduct and/or

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<sup>1</sup> Chegg, Inc. advertises for employees within zipcode 10016 and maintains on its website and in its SEC filings at [chegg.com](http://chegg.com) that it has an office in New York, New York.

deriving substantial revenue from goods and services provided to individuals in New York and this District.

### **III. INFRINGEMENT ('107 Patent)**

7. On May 22, 2018, U.S. Patent No. 9,978,107 (“the ‘107 patent”, attached as Exhibit A) entitled “Method and System for Establishing and Using a Social Network to Facilitate People in Life Issues” was duly and legally issued by the U.S. Patent and Trademark Office. NetSoc, LLC owns the ‘107 patent by assignment.

8. The ‘107 patent relates generally to a method and system for establishing and using a social network to facilitate people in life issues.

#### ***A. Defendant***

9. Chegg maintains, operates, and administers a website at [www.chegg.com](http://www.chegg.com) that infringes one or more claims of the ‘107 patent, including at least claims 1-11, literally or under the doctrine of equivalents. Defendant put the inventions claimed by the ‘107 Patent into service (i.e., used them); but for Defendant’s actions, the claimed-inventions embodiments involving Defendant’s products and services would never have been put into service. Defendant’s acts complained of herein caused those claimed-invention embodiments as a whole to perform, and Defendant’s procurement of monetary and commercial benefit from it.

10. Support for the allegations of infringement may be found in the following preliminary table:

Claim 6	Accused Product (or Service)
<p>6. A computer system comprising:</p>	<p>Plaintiff contends that Chegg provides computer system that is, one or more servers or databases to provide Chegg Tutors service.</p>  <p><b>Attachment 1 (How Chegg Tutors works (Webpage, 2018)) at 1.</b></p>
<p>a memory to store a list comprising a plurality of participants, wherein each participant in the plurality of participants corresponds to one or more individuals, wherein the list also includes information associated with at least one of each participant or the one or more individuals that correspond to each participant;</p> <p>one or more processors that</p>	<p>Plaintiff contends that by using one or more servers or databases (which contain processors and memory), Chegg stores and maintains data of one or more participants or individuals along with their information.</p>  <p><b>Attachment 1 (How Chegg Tutors works (Webpage, 2018)) at 1.</b></p>

execute instructions  
to:  
maintain the list;

**FILTER BY**


☐ Ready to teach now!  
☐ Online

**KEYWORDS**  
e.g. Stanford, piano, James


**ADDITIONAL SUBJECTS**  
Choose subject(s)

**GENDER**  
☒ No preference  
☐ Male  
☐ Female


Showing 1-10 of thousands of results (34 online)




**Raj K.** Programming tutor  
Birla Institute of Technology and Science, Pilani – Goa Campus 2016 - Engi...  
"I am currently a 4th year UG student pursuing a 4 year integrated M.Sc. (Hons.) Physics programme with an intensive focus on..."  
51




**Harjoben S.** Programming tutor  
Nanyang Technological University, Singapore 2013 - Computer Engineering  
"I tutored 8th to 10th grade students in Physics, Maths and Java programming along with my undergraduate studies for two years..."  
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**Arfat S.** Programming tutor  
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"I have taken various live and written lessons. I am able to clearly communicate various computer science concepts efficiently..."  
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**Soumith R.** Programming tutor  
VIT University, Vellore 2017 - Electronics and communication  
"I have enjoyed tutoring my juniors at college in the courses and also mentored them during projects. I have also been a part..."  
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**Zohreh E.** Programming tutor  
Islamic Azad University 2008 - Computer and Electronic engineering  
"I hold a Computer and Electronic Engineering B.sc and M.sc from the Islamic Azad University in Iran. I have completed my PhD..."  
110

### Attachment 2 (Find a Programming tutor (Webpage, 2018))

Chegg stores and maintains data of plurality of candidates or participants along with their information.



**Raj K.** ✓

51 4 (92% positive)

Birla Institute of Technology and Science, Pilani – Goa Campus, Class of 2016

Engineering & Science

Tutors live lessons

**Subjects tutored:** ACT Math, ACT Science, Algebra, Applied Mathematics, Astronomy, Basic Math, Basic Science, Calculus, Chemistry, College Admissions, Computer Science, English as a Second Language, Geometry, LaTeX, Linear Algebra, Physics, Pre-Algebra, Pre-Calculus, SAT II Mathematics Level 1, SAT II Physics, SAT Math, and Trigonometry

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**Send Raj a message**  
Let Raj know what you'd like help with and when to ensure you get your ideal lesson.

**Send message**

**LIKELIHOOD OF REPLY**  
90%+

**EXPECTED RESPONSE TIME**  
< 5 min

**Frequently Asked Questions**

- + How do lessons work?
- + Who are Chegg's tutors?
- + How much does tutoring cost?
- + How do I set up my first lesson?

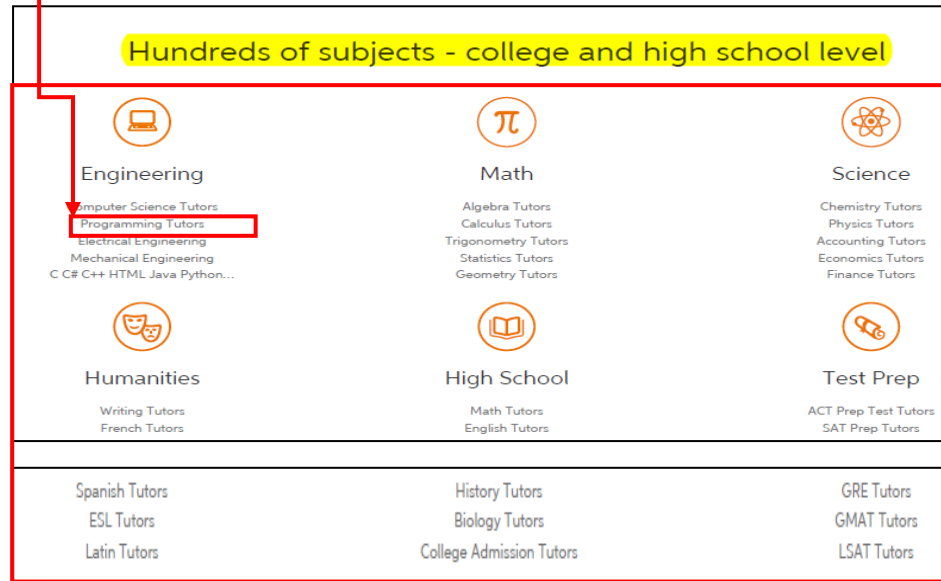
### Attachment 3 (Raj K. (Webpage, 2018)) at 1.

present a user with an interface from which the user makes a selection of a category

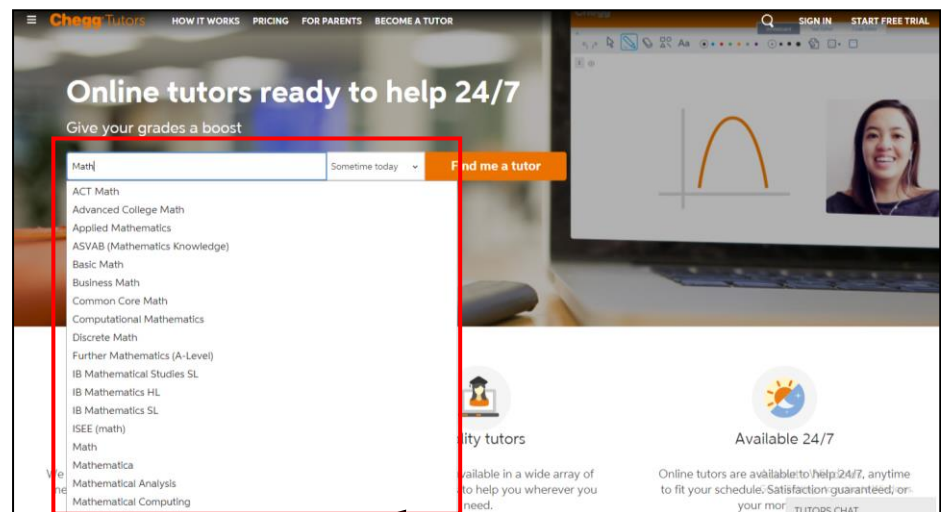
Plaintiff contends that by using Chegg Tutors service, user is presented with an interface for making a selection of a category from a plurality of categories.

from a plurality of categories;

User can select a category (for example, "Programming Tutors") from a plurality of categories by using the interface.



**Attachment 4 (Online tutors ready to help 24/7 (Webpage, 2018)) at 5 and 6.**



Another example of selection of a category from a plurality of categories

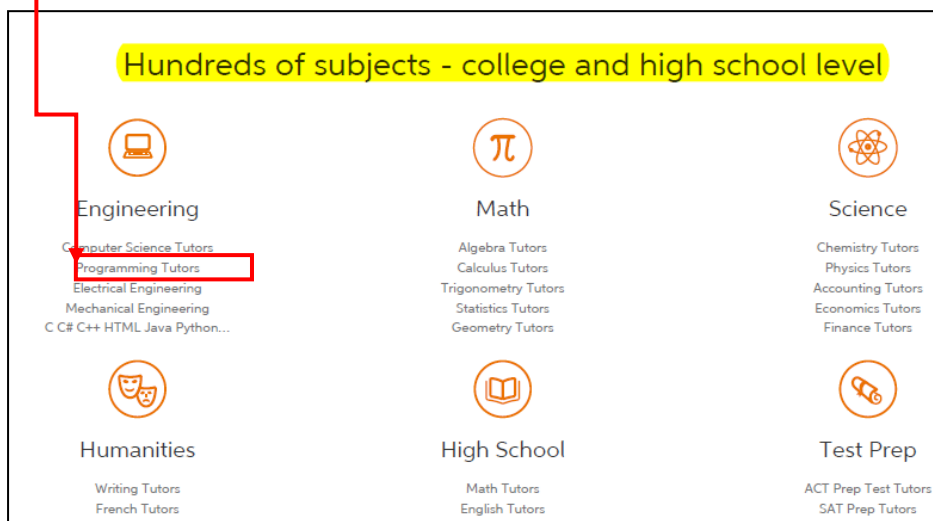
[Snapshot taken from site: [www.chegg.com/tutors/](http://www.chegg.com/tutors/)]

in response to receiving the selection of the category by the user, present, for the user, some of the information associated with each of multiple participants from the plurality of participants which match the selection of the category by the user, while shielding contact information associated with each of the multiple participants;

Plaintiff contends that based on the selection of the category, some of the information associated with each of multiple participants from the plurality of

participants is displayed to the user which matches the selection of the category by the user. Also, contact information of each of the multiple participants is shielded from the user.

Selection of the category by the user (for example, "Programming Tutors" in this case)




**Attachment 4 (Online tutors ready to help 24/7 (Webpage, 2018)) at 5.**

	<div> <div> <p><b>FILTER BY</b></p> <p><input type="checkbox"/> Ready to teach now!</p> <p><input type="checkbox"/> Online</p> <p><b>KEYWORDS</b></p> <p><input type="text" value="e.g. Stanford, piano, James"/></p> <p><b>ADDITIONAL SUBJECTS</b></p> <p><input type="text" value="Choose subject(s)"/></p> <p><b>GENDER</b></p> <p><input checked="" type="radio"/> No preference</p> <p><input type="radio"/> Male</p> <p><input type="radio"/> Female</p> </div> <div> <p>Showing 1-10 of thousands of results (34 online)</p> <div> <div></div> <div> <p><b>Raj K.</b> Programming tutor</p> <p>Birla Institute of Technology and Science, Pilani – Goa Campus 2016 - Engi...</p> <p>"I am currently a 4th year UG student pursuing a 4 year Integrated M.Sc. (Hons.) Physics programme with an intensive focus on..."</p> <p>51</p> </div> </div> <div> <div></div> <div> <p><b>Harjoben S.</b> Programming tutor</p> <p>Nanyang Technological University, Singapore 2013 - Computer Engineering</p> <p>"I tutored 8th to 10th grade students in Physics, Maths and Java programming along with my undergraduate studies for two years..."</p> <p>37</p> </div> </div> <div> <div></div> <div> <p><b>Arfat S.</b> Programming tutor</p> <p>University of Delhi 2017 - Computer Science</p> <p>"I have taken various live and written lessons. I am able to clearly communicate various computer science concepts efficiently..."</p> <p>103</p> </div> </div> <div> <div></div> <div> <p><b>Soumith R.</b> Programming tutor</p> <p>VIT University, Vellore 2017 - Electronics and communication</p> <p>"I have enjoyed tutoring my juniors at college in the courses and also mentored them during projects. I have also been a part..."</p> <p>1</p> </div> </div> <div> <div></div> <div> <p><b>Zohreh E.</b> Programming tutor</p> <p>Islamic Azad University 2008 - Computer and Electronic engineering</p> <p>"I hold a Computer and Electronic Engineering B.sc and M.sc from the Islamic Azad University in Iran. I have completed my PhD..."</p> <p>110</p> </div> </div> </div> </div>
<p><b>Attachment 2 (Find a Programming tutor (Webpage, 2018)) at 2.</b></p> <div> <p>Some of the information associated with each participant from the plurality of participants is displayed to the user matching the selection of the category, while the contact information remains hidden from the user.</p> </div>	




*Id.* at 3.




**Maha D.** Programming tutor  
Anand Institute of Higher Technology 2016 - Computer Science  
"I love tutoring and I would like to contribute back what I learned to those who have curiosity and urge to learn."

136




**Alex N.** Programming tutor  
Virginia Tech 2014 - Computer Science  
"I can help with MIPS assembly! A subject a lot of people struggle with. I was a TA for 3 years at Virginia Tech. I build a..."

33



**Craig W.** Programming tutor  
California Institute of Technology 2020 - Mechanical Engineering  
"When I was a sophomore in high school, in collaboration with the National Math Honor Society, I created a peer math tutoring..."

6



**Kelly N.** Programming tutor  
Gustavus Adolphus College 2018 - Physics  
"I have worked as a tutor, teaching assistant, and grader during my time as an undergraduate student studying physics and will..."


2


Showing 1-10 of thousands

1 2 3 4 5 6 7 ... 266 Next »


Tutors / Engineering and Technology / Programming


The contact information of each participant remains hidden from the user




**Raj K.** 

51 4 (92% positive)

 Birla Institute of Technology and Science, Pilani – Goa  
Campus, Class of 2016

 Engineering & Science

 Tutors live lessons

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**Send Raj a message**

Let Raj know what you'd like help with and when to ensure you get your ideal lesson.

**Send message**

**LIKELIHOOD OF REPLY**  
**90%+**

**EXPECTED RESPONSE TIME**  
**< 5 min**

**Frequently Asked Questions**

- + How do lessons work?
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Attachment 3 (Raj K. (Webpage, 2018)) at 1.

wherein displaying some of the information associated with each of the multiple participants is based at least in part on a rating of individual participants in the plurality of participants;

Plaintiff contends that the information associated with each of the multiple participants is displayed based on a rating or ranking of individual participant in the plurality of participants.

Information of each participant is displayed based on a rating or ranking of individual participant in the plurality of participants. For example, tutors with status as "Online" (With Green Icon) or "Ready to teach now!" (With Green Icon including Check Mark) are shown first in the ranking because they will most likely respond to any user's inquiry. Offline tutors are assigned low rating.

#### FILTER BY

- ☐ Ready to teach now!  
☐ Online

#### KEYWORDS

e.g. Stanford, piano, James






#### ADDITIONAL SUBJECTS

Choose subject(s)





#### GENDER

- ☒ No preference  
☐ Male  
☐ Female

Showing 1-10 of thousands of results (34 online)

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**Attachment 2 (Find a Programming tutor (Webpage, 2018)) at 2.**

	<div data-bbox="532 205 1437 886" style="border: 2px solid red; padding: 10px;">  <p><b>Maha D.</b> Programming tutor Anand Institute of Higher Technology 2016 - Computer Science "I love tutoring and I would like to contribute back what I learned to those who have curiosity and urge to learn." 136</p> <hr/>  <p><b>Alex N.</b> Programming tutor Virginia Tech 2014 - Computer Science "I can help with MIPS assembly! A subject a lot of people struggle with. I was a TA for 3 years at Virginia Tech. I build a..." 33</p> <hr/>  <p><b>Craig W.</b> Programming tutor California Institute of Technology 2020 - Mechanical Engineering "When I was a sophomore in high school, in collaboration with the National Math Honor Society, I created a peer math tutoring..." 6</p> <hr/>  <p><b>Kelly N.</b> Programming tutor Gustavus Adolphus College 2018 - Physics "I have worked as a tutor, teaching assistant, and grader during my time as an undergraduate student studying physics and will..." 2</p> </div> <div data-bbox="511 919 1453 961"> <p>Showing 1-10 of thousands</p> <div> 1 2 3 4 5 6 7 ... 266 Next » </div> </div> <div data-bbox="527 1003 938 1033"> <p>Tutors / Engineering and Technology / Programming</p> </div>
<p>enabling the user to send an inquiry message to one or more of the multiple participants, while shielding the contact information from the user, the contact information including any messaging identifier that is associated with each of the one or more participants;</p>	<p><b>Id. at 3.</b></p> <p>Plaintiff contends that user or student can send inquiry message(s) to one or more participants or tutors, while the contact information associated with each participant (such as emails, messaging identifiers, etc.) remains hidden or shielded from the user.</p>

← → ↻

https://www.chegg.com/tutors/Computer-Science-online-tutoring/?p=1&filter-subjects=30&filter-gender=

☰

CheggTutors

can help

HOW IT WORKS

PRICING

FOR PARENTS

BECOME A TUTOR

Q

SIGN IN

Questions? Call 1(855) 411-5743

~ New students get 30 minutes FREE! - Only 50¢/minute after—save even more with larger plans ~

FILTER BY

☐ Ready to teach now!

☐ Online

KEYWORDS

e.g. Stanford, piano, James

ADDITIONAL SUBJECTS

Choose subject(s)


GENDER

☒ No preference

☐ Male

☐ Female

Showing 1-10 of thousands of results (54 online)



Sanjay K.


Computer Science tutor

Indian Institute of Science 2009 - Computer Science

"My first experience of teaching started, when I was pursuing engineering. I used to teach math to pre-school students for..."

257

Message




Sudhanshu B.

Computer Science tutor

Krishna Institute of Engineering and Technology, Ghaziabad 2017 - Electron...

"I have been a tutor for Tutor.com, where I tutored algebra, trigonometry, and c++ programming. Working for them gave me the..."

241




Arpit G.

Computer Science tutor

IIT Dhanbad 2012 - Electronics and Communication Engineering

"My tutoring experience started when i was preparing for IIT-JEE examination and many students approached me to solve their..."

337



Arfat S.

Computer Science tutor

University of Delhi 2017 - Computer Science

"I have taken various live and written lessons. I am able to clearly communicate various computer science concepts efficiently. "


104


**[Snapshot taken from the**


**website:https://www.chegg.com/tutors/Computer-Science-online-tutoring/?p=1&filter-subjects=30&filter-gender=]**


12

User or student can send inquiry message(s) to one or more participants, while the contact information associated with each participant (such as emails, messaging identifiers, etc.) remains hidden or shielded from the user.

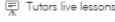
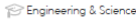
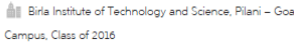


Raj K. 

 51

 4

(92% positive)



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About

Reviews

Subject expertise

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LIKELIHOOD OF REPLY

90%+

EXPECTED RESPONSE TIME

< 5 min

Frequently Asked Questions

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+ How do I set up my first lesson?

Attachment 3 (Raj K. (Webpage, 2018)) at 1.

Inquiry message is sent to one or more participants, while the contact information remains hidden from the user or student.



Raj K.

Birla Institute of Technology and Science, Pil...

Major: Engineering & Science

51

4

Subject

C Programming

Urgency

☒ ASAP
 ☐ Today
 ☐ This week

**Example message:** I was wondering if you'd be able to help me with some Linear Programming problems. I'm in an undergraduate Operations Management course and some of the questions on my homework about seasonality are confusing me. Here's a problem I need help with—find vertices of the region defined by system:

$$3x_1 + x_2 + x_3 + x_4 = 1$$

$$x_1 + 6x_2 - 2x_3 + x_4 = 1$$

$$x_1, x_2, x_3, x_4 \geq 0$$

Does the system have degenerate vertices?

☒ Have other tutors contact me if they can help

Submit request

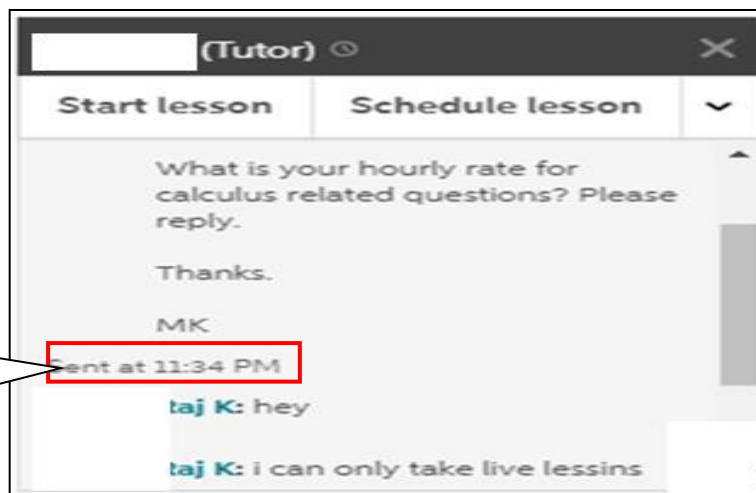
[Snapshot taken from website:

<https://www.chegg.com/tutors/online-tutors/Raj-K-199228/?sid=30>  
and Clicking over the “Send message”]

tracking a response time of each of the one or more participants who received the message from the user, and

Response time of each participant is tracked who receives the message from the user.

Plaintiff contends that response-time of each participant who received the message from the user is tracked.



[Snapshot taken after creating user's profile in chegg.com]

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Response time of each participant is tracked

**Attachment 3 (Raj K. (Webpage, 2018)) at 1.**

updating the rating associated with each of the one or more participants based at least in part on the tracked response time.

Plaintiff contends that rating of each participant is updated based on his or her response-time. For example, in case of Chegg Tutors, once the user sends the inquiry message, each participant's response time is tracked and each participant's rating gets updated based on his or her response-time.

Response time of each participant is tracked based on which his rating is updated

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110

Attachment 2 (Find a Programming tutor (Webpage, 2018)) at 2.

Response-time is a key parameter in deciding or updating ranking or rating of each participant. For example, those participants with quick response time, they are given preference and are assigned higher rating than other participants.

17

**Maha D.** Programming tutor  
Anand Institute of Higher Technology 2016 - Computer Science  
"I love tutoring and I would like to contribute back what I learned to those who have curiosity and urge to learn." 136

**Alex N.** Programming tutor  
Virginia Tech 2014 - Computer Science  
"I can help with MIPS assembly! A subject a lot of people struggle with. I was a TA for 3 years at Virginia Tech. I build a..." 33

**Craig W.** Programming tutor  
California Institute of Technology 2020 - Mechanical Engineering  
"When I was a sophomore in high school, in collaboration with the National Math Honor Society, I created a peer math tutoring..." 6

**Kelly N.** Programming tutor  
Gustavus Adolphus College 2018 - Physics  
"I have worked as a tutor, teaching assistant, and grader during my time as an undergraduate student studying physics and will..." 2

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Tutors / Engineering and Technology / Programming

***Id. at 3.***

- These allegations of infringement are preliminary and are therefore subject to change.

11. Chegg Inc. has and continues to induce infringement. Chegg Inc. has actively encouraged or instructed others (e.g., its customers and/or the customers of its related companies), and continues to do so, on how to use its products and services (e.g., online tutoring services on the Internet] and related services that provide online tutoring services across the Internet such as to cause infringement of claims 1–11 of the '107 patent, literally or under the doctrine of equivalents. Moreover, Chegg Inc. has known of the '107 patent and the technology underlying it from at least the date of issuance of the patent.

12. Chegg Inc. has and continues to contributorily infringe. Chegg Inc. has actively encouraged or instructed others (e.g., its customers and/or the customers of its related companies), and

continues to do so, on how to use its products and services (e.g., online tutoring services on the Internet] and related services that provide online tutoring services across the Internet such as to cause infringement of claims 1–11 of the '107 patent, literally or under the doctrine of equivalents. Moreover, Chegg Inc. has known of the '107 patent and the technology underlying it from at least the date of issuance of the patent.

13. Chegg Inc. has caused and will continue to cause NETSOC damage by direct and indirect infringement of (including inducing infringement of) the claims of the '107 patent.

#### **IV. JURY DEMAND**

NETSOC hereby requests a trial by jury on issues so triable by right.

#### **V. PRAYER FOR RELIEF**

- i. WHEREFORE, NETSOC prays for relief as follows:
  - a. enter judgment that Defendant has infringed the claims of the '107 patent through each of tinder.com; okcupid.com; pof.com; and match.com;
  - b. award NETSOC damages in an amount sufficient to compensate it for Defendant's infringement of the '107 patent, in an amount no less than a reasonable royalty or lost profits, together with pre-judgment and post-judgment interest and costs under 35 U.S.C. § 284;
  - c. award NETSOC an accounting for acts of infringement not presented at trial and an award by the Court of additional damage for any such acts of infringement;
  - d. declare this case to be "exceptional" under 35 U.S.C. § 285 and award NETSOC its attorneys' fees, expenses, and costs incurred in this action;

- e. declare Defendant's infringement to be willful and treble the damages, including attorneys' fees, expenses, and costs incurred in this action and an increase in the damage award pursuant to 35 U.S.C. § 284;
- f. a decree addressing future infringement that either (i) awards a permanent injunction enjoining Defendant and its agents, servants, employees, affiliates, divisions, and subsidiaries, and those in association with Defendant from infringing the claims of the Patents-in-Suit, or (ii) awards damages for future infringement in lieu of an injunction in an amount consistent with the fact that for future infringement the Defendant will be an adjudicated infringer of a valid patent, and trebles that amount in view of the fact that the future infringement will be willful as a matter of law; and
- g. award NETSOC such other and further relief as this Court deems just and proper.

Respectfully submitted,

**Ramey & Schwaller, LLP**

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*Attorneys for NetSoc, LLC*